

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SANA MUJAHID,)	
<i>on behalf of herself and</i>)	Civil Action No.: 25-cv-8012
<i>others similarly situated,</i>)	
)	Class Action Complaint
Plaintiff,)	
)	
v.)	
)	
NEWITY, LLC,)	Honorable Jorge L. Alonso
)	
)	
Defendant.)	
_____)	

PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE OVERSIZED BRIEF

Plaintiff Sana Mujahid respectfully moves for leave to file an oversized opposition to Defendant’s motion to dismiss, and states as follows:

1. On September 29, 2025, Defendant filed its Memorandum of Law in Support of Motion to Dismiss Plaintiff’s First Amended Complaint (the “MTD”). The brief raises multiple issues, including statutory construction of 47 U.S.C. § 227(c), the applicability of recent Supreme Court authority to the TCPA, and theories of direct and vicarious liability.
2. Under Local Rule 7.1, memoranda in opposition are ordinarily limited to 15 pages, and replies to 5 pages, absent leave of Court.
3. Given the number and complexity of issues presented by the MTD—including questions of statutory text, agency deference, and competing district-court interpretations—Plaintiff respectfully requests a modest enlargement to allow for complete and efficient briefing without the need for piecemeal supplemental filings.
4. Plaintiff conferred with Defendant’s counsel and Defendant consents.
5. Requested relief. Plaintiff proposes the Court enter an order providing that:

6. The requested enlargement is reasonable and will aid the Court by allowing the parties to address the issues thoroughly in a single round of briefing.

7. This motion is made in good faith and not for purposes of delay. Granting the motion will not affect the currently-set briefing schedule; the parties will adhere to any deadlines previously ordered or subsequently set by the Court.

WHEREFORE, Plaintiff respectfully requests that the Court grant this unopposed motion.

PLAINTIFF,
By her attorney

/s/ Anthony I. Paronich
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